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**UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
vs.
HARQUESHA MATTHEWS,
Plaintiff,
Defendant.

Case No.: 2:23-mj-01070-DJA

STIPULATION TO CLOSE CASE

IT IS STIPULATED AND AGREED, by and between JASON M. FRIERSON,
United States Attorney, and Skyler Pearson, Assistant United States Attorney, counsel for the
United States of America, and James Gallo, Esquire, counsel for the defendant Harquesha
Matthews, that the above-captioned matter be closed.

This Stipulation is entered into based upon the following:

1. On or about June 5, 2024, defendant entered into a Petty Offense Agreement with the United States in which he agreed to plead guilty to Count One of the Complaint, Operating a Motor Vehicle while Under the Influence of Drugs, in violation of 36 C.F.R. § 4.23(a)(1). See ECF No. 13.

2. The parties agreed to recommend that defendant be sentenced to one year of unsupervised probation with the following special conditions: (i) pay a \$1000.00 fine and a

1 mandatory \$10 penalty assessment; (ii) attend and complete the Lower Court Counseling's (1)
2 DUI course and (2) Victim Impact Panel; (iii) complete an eight (8) hour online drug
3 awareness course; (iv) not return to Lake Mead National Recreation Area for a period of six
4 (6) months; and (v) not violate any local, state, or federal laws for a period of six (6) months.

5 If the defendant successfully completes his obligations within six months of unsupervised
6 probation, the court will allow the defendant to withdraw her guilty plea to count one and the
7 government will move to amend count one to reckless driving.
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9 3. On June 5, 2024, this Court sentenced defendant pursuant to the parties' plea
10 agreement. *See* ECF No. 13.

11 4. Since commending her term of unsupervised probation, defendant has
12 successfully completed conditions (i), (ii), (iii), and (iv).

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1 5. As such, the parties jointly request that the defendant be allowed to withdraw
2 her guilty plea to count one and the government moves to amend count one to reckless
3 driving. The parties also jointly request that the above-captioned matter be closed.

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5 DATED this 20th day of August, 2024.

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7 Respectfully submitted,

8 JASON M. FRIERSON
9 United States Attorney

10

11 /s/ James Gallo
12 JAMES GALLO, ESQ.
13 Attorney for Defendant
HARQUESHA MATTHEWS

14

15 /s/ Skyler Pearson
16 SKYLER PEARSON
17 Assistant United States Attorney

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2 **UNITED STATES DISTRICT COURT**
3 **IN AND FOR THE DISTRICT OF NEVADA**

4
5 UNITED STATES OF AMERICA,)
6 Plaintiff,)
7 vs.)
8 HARQUESHA MATTHEWS,)
9 Defendant.)
10)
11)

12 Case No.: 2:23-mj-01070-DJA

13 **ORDER TO CLOSE THE CASE**

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15 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
16 Court finds that:

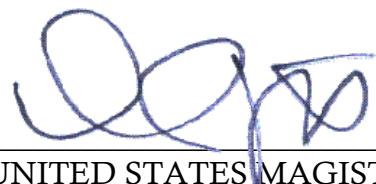
17 1. Defendant Harquesha Matthews has successfully completed the conditions of
18 her sentencing.

19 **ORDER**

20 IT IS HEREBY ORDERED that the defendant is allowed to withdraw her guilty plea
21 to count one and that the count one be amended to reckless driving.

22 IT IS HEREBY ORDERED that the parties move the Court in the above-captioned
23 matter case be closed, as all requirements have been completed.

24 DATED this 26th day of August, 2024

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28 UNITED STATES MAGISTRATE JUDGE